

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION AT CINCINNATI

MARSHA REESE	:	Case No. <u>1:22-cv-00661</u>
	:	
Plaintiff,	:	
	:	
v.	:	NOTICE OF REMOVAL
	:	
CINCINNATI METROPOLITAN HOUSING	:	
AUTHORITY	:	
	:	
Defendants.	:	
	:	

The Defendant, Cincinnati Metropolitan Housing Authority ("CMHA"), files this Notice of Removal to the United State District Court for the Southern of Ohio, Western Division, and states as follows:

1. On October 18, 2022, the Plaintiff, Marsha Reese, filed a Complaint against CMHA in the Hamilton County, Ohio Court of Common Pleas. The Clerk of the Hamilton County, Ohio Court of Common Pleas assigned the Complaint as Case No. A2203787.

2. A true and accurate copy of the Summons and Complaint served on CMHA is attached as Exhibit A. The Summons and Complaint constitute all of the pleadings served upon CMHA in this action.

3. This Court has jurisdiction over the action pursuant to 28 USC §1331 and 28 USC §1441, in that:

- (a) In her Complaint, Plaintiff asserts claims for violations of the Fair Housing Act, 42 USC §3601, *et seq.* and the Rehabilitation Act of 1973, 29 USC §701 *et seq.*, claims for which the United States District Courts are given original jurisdiction; and,
- (b) In her Complaint, Plaintiff also alleges related state law claims for violation of the Ohio Landlord Tenant Act, KRS 5321.04 and KRS 5321.12, negligence, breach of contract, intentional infliction of emotional distress,

and breach of the Cincinnati Municipal Code, claims for which the United States District Courts have supplemental jurisdiction.

4. This Notice of Removal is filed within thirty days after CMHA was served with a copy of the Summons and Complaint in this action.

5. This civil action is properly removable pursuant to 28 USC §1441(a).

6. The date by which CMHA is required under state law to answer or otherwise plead to the Complaint has not expired as of the date of the filing of this Notice of Removal.

7. Pursuant to 28 USC §1446(d), a true and accurate copy of the Notice of Removal is being filed electronically with the Hamilton County Court of Common Pleas this 14<sup>th</sup> day of November, 2022.

8. A true and accurate copy of this Notice of Removal is being sent electronically to Plaintiff's counsel this 14<sup>th</sup> day of November, 2022.

WHEREFORE, the Defendant, Cincinnati Metropolitan Housing Authority, gives notice of the removal of the action from the Hamilton County Common Pleas to the United States District Court for the Southern District of Ohio, Western Division at Cincinnati.

Respectfully submitted,

/s/ Jeffrey C. Mando

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*Attorneys for Defendant, Cincinnati  
Metropolitan Housing Authority*

**CERTIFICATE OF SERVICE**

I hereby certify that on this **14<sup>th</sup>** day of November, 2022, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system.

**/s/ Jeffrey C. Mando**

Jeffrey C. Mando, Esq.